

Brick, David

From: MAUGHAN, JASON [AG/1850] <jason.maughan@monsanto.com>
Sent: Thursday, September 01, 2016 12:24 PM
To: Brick, David
Subject: RE: EPA Request for P4 Monsanto NPDES Re-Application
Attachments: Draft Form_1 P4 Production 09012016.pdf; Draft Facility Map P4 Production 09012016.pdf; Draft Form_2C P4 Production 09012016.pdf; Draft Flow Diagram P4 Production 09012016.pdf

Follow Up Flag: Follow up
Flag Status: Completed

David,

Attached are draft versions of the NPDES application forms you requested. As discussed, we will submit the final versions by no later than October 1, 2016.

The draft version of form 2C attached to this email includes the concentration of certain constituents you asked us to include if believed to be present. Please note, however, that P4 does not discharge process waste water; thus, these constituents are believed to be present in P4's discharges due largely to their presence in intake water.

The final version of form 2C will include the narrative for section IV.B, which we are still drafting. This narrative will provide much the same information we discussed during the meeting we had with you, the EPA CERCLA Representatives, and Idaho DEQ staff a few weeks ago – i.e., the anticipated implementation of a CERCLA remedy to address groundwater constituents and the need for Idaho DEQ to revise the Bear River TMDL for Soda Creek for total phosphorus to account for P4's existing discharges (which had been inadvertently overlooked).

We look forward to reviewing your comments to the attached and working with you to ensure a good outcome.

Thanks,

Jason Maughan
Sr. Environmental Regulatory Specialist
Monsanto - Soda Springs, ID
Office: 208-547-1239



From: Brick, David [mailto:brick.david@epa.gov]
Sent: Thursday, August 25, 2016 3:38 PM
To: MAUGHAN, JASON [AG/1850]
Subject: RE: EPA Request for P4 Monsanto NPDES Re-Application

Hi Jason,

As discussed we have agreed to extend the P4 Monsanto Re-Application Deadline to October 1st, 2016. We have also agreed that P4 Monsanto will supply a Draft Application directly to me by the original deadline on September 1st, 2016. I will review the Draft Application and provide any comments or feedback to you prior to October 1st.

Thank you and if you have any questions feel free to contact me at any time.

David Brick

Permit Writer | NPDES Permits Unit

US EPA Region 10 | Seattle, WA

Phone: 206-553-1389

E-mail: brick.david@epa.gov

From: Brick, David

Sent: Friday, May 06, 2016 2:25 PM

To: jason.maughan@monsanto.com

Subject: EPA Request for P4 Monsanto NPDES Re-Application

Hi Jason,

After reviewing the NPDES Application for P4 Monsanto that is currently on file from December 22, 1981, I have determined that I need additional and updated information in order to proceed with re-issuing the P4 Monsanto NPDES Permit. This is because the data is 35 years old and may not be representative of current practices at the P4 Monsanto plant, and/or does not reflect changes that may have occurred in the source water (groundwater).

For the NPDES Application please complete and send in following forms:

- (1) General Information Form 1
- (2) NPDES Permit Application Form 2C

In addition to the default sampling required by the Permit Application forms, I am requesting the following:

- (1) Intake sampling for all pollutants that are marked "believed to be present," in addition to the normally required Effluent sampling for all pollutants that are marked "believe to be present." This sample should be taken before the intake water comes into contact with any processes, heat exchangers, additives, etc. within the facility. In 1981 the following contaminants were listed as "believed to be present:"
 - a. Bromide, Color, Fecal Coliform, Fluoride, Nitrate-Nitrite, Nitrogen, Total organic (as N), Oil and Grease, Total Phosphorus (as P), Total Alpha, Total Beta, Total Radium, Total Radium 226, Sulfate (as SO₄), Sulfide (as S), Sulfite (SO₃), Aluminum, Total Barium, Total Boron, Total Cobalt, Total Iron, Total Magnesium, Total Molybdenum, Total Manganese, Total Tin, Total Titanium, Total Antimony, Total Arsenic, Total Beryllium, Total Cadmium, Total Chromium, Total Copper, Total Lead, Total Mercury, Total Nickel, Total Selenium, Total Silver, Total Thallium, Total Zinc, Total Cyanide, and Total Phenols.
 - b. If P4 Monsanto believes any of these contaminants to no longer be present in their discharge and would mark them as "Believed Absent," please include a list of all parameters which are no longer believed to be present and an explanation as to why they are no longer believed to be present. The EPA strongly encourages P4 Monsanto to test for all parameters that were above the Level of Detection in the 1981 application.
- (2) At a minimum, the following parameters must be tested in the intake and effluent water: Total Phosphorus, Oil & Grease, Total Suspended Solids, Cadmium, Fluoride, Nitrate-Nitrite, Selenium, and Manganese.

- (3) If any of the requested testing has already been completed within the past 12 months and is a representative sample which followed EPA sampling requirements, there is no need to re-sample; P4 Monsanto may send the sample results from earlier tests within the past year.

All completed forms should be sent directly to the following address on or before **September 1st, 2016** at the following address:

Audrey Washington, Mail Stop: OWW-191
Office of Water & Watersheds, NPDES Permits Unit
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Thank you for your assistance and if you have any questions feel free to contact me at any time.

David Brick

Permit Writer | NPDES Permits Unit
US EPA Region 10 | Seattle, WA
Phone: 206-553-1389
E-mail: brick.david@epa.gov

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